

## EXHIBIT 455

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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IN RE: NATIONAL	:	
PRESCRIPTION	:	MDL No. 2804
OPIATE LITIGATION	:	
	:	Case No.
	:	1:17-MD-2804
THIS DOCUMENT RELATES	:	
TO ALL CASES	:	Hon. Dan A. Polster

- - -

Thursday, January 3, 2019

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
CONFIDENTIALITY REVIEW

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Videotaped deposition of JILL A. STRANG, held  
at the offices of Cavitch, Familo & Durkin,  
1300 East Ninth Street, Cleveland, Ohio, commencing at  
8:57 a.m., on the above date, before Carol A. Kirk,  
Registered Merit Reporter and Notary Public.

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<p style="text-align: right;">Page 62</p> <p>1 A. They call if they need -- if they 2 have questions, if they need something. I do 3 communicate with all of the stores. 4 Q. Is it mostly a, "Hey, Jill, we 5 need this many bottles of this drug and it 6 didn't show up on time or we need it by this 7 date"? 8 Is that mostly what it's like? 9 A. Every day when the trucks are 10 there, if they need something, if they have 11 questions about different topics, recalls. I 12 mean, I talk to everybody about all the topics. 13 Q. Okay. 14 A. Daily. 15 Q. Do you also communicate or act as 16 an intermediary between DDM and distributors or 17 manufacturers? 18 A. I do. 19 Q. Because you're the buyer, right? 20 A. Yes. 21 Q. So you're the primary person 22 communicating with them, at least on the front 23 end, to get product, correct? 24 A. Yes.</p>	<p style="text-align: right;">Page 64</p> <p>1 necessarily limiting it to you, but I can ask 2 follow -- I'll ask follow-ups, but describe for 3 me what DDM's policies and procedures are 4 regarding the diversion of opioids. 5 A. Are you referring to when they 6 order from me, from the distribution center? 7 Q. Just kind of -- what I'd like you 8 to do is give me a full picture of what DDM does 9 to prevent diversion and comply with the CSA. 10 A. Okay. So what we do is, the 11 stores order weekly. 12 Q. Okay. 13 A. It is ordered through a system 14 called Pioneer. It gives them a recommended 15 order. Each store can set their own minimums 16 and maximums on that. So that way, you know, 17 everything is -- certain stores -- depending on 18 how much they've been dispensing. That order is 19 sent over. 20 As soon as they send the order, 21 they receive back a document that says, "Order 22 items over six-week average." They're given the 23 opportunity right there to review any items. 24 Sometimes it has no items. I've seen a few that</p>
<p style="text-align: right;">Page 63</p> <p>1 Q. Okay. Presumably somebody else 2 pays invoices later and they probably 3 communicate with their financial department, but 4 you're primarily communicating with them on a 5 drug procurement level, right? 6 A. Yes. 7 Q. And that would include, you know, 8 issues regarding diversion and suspicious order 9 monitoring? 10 A. Yes. 11 Q. And drug thresholds and things 12 like that? 13 A. Yes. 14 Q. Okay. And as the individual at 15 DDM primarily responsible for suspicious order 16 monitoring on the distribution end, you agree 17 that DDM has an obligation to monitor orders and 18 shipments for suspicious -- or that look 19 suspicious or may have red flags? 20 A. Yes. 21 Q. Indicative of diversion? 22 A. Yes. 23 Q. Okay. So tell me what -- and I'm 24 just going to talk generally speaking. I'm not</p>	<p style="text-align: right;">Page 65</p> <p>1 have just antibiotics on them, you know, nothing 2 controlled. And, you know, they ordered three 3 bottles instead of two bottles. But they are 4 given that chance to review if anything 5 populates over a six-week average. They have 6 the opportunity to send that to me. 7 As we get the orders, prior to 8 2016, we had a -- it was called a pick ticket. 9 It was a manual way of pulling. And the pullers 10 would -- you know, if it says they wanted two of 11 this, they'd put two, and they'd manually write 12 a two. Items on that pick ticket would have an 13 asterisk next to it if it could have been on the 14 six-week average report, over six-week average. 15 It was very rare that any controls 16 would show up on that. The other items -- 17 unless something -- again, the pullers know 18 their product. You know, if they wanted -- if 19 they normally pull one, two or three of 20 something and all of a sudden somebody wants 20 21 of something, that would be brought to my 22 attention. 23 In our system, I have history of 24 every item. So I would go into the history of</p>